

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

In re Provectus Biopharmaceuticals, Inc.
Securities Litigation

Case No. 3:14-cv-00338-PLR-HBG

CLASS ACTION

District Judge Pamela L. Reeves

Magistrate Judge H. Bruce Guyton

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT, CONDITIONAL CERTIFICATION OF A CLASS, AND
ESTABLISHING NOTICE PROCEDURES**

Lead Plaintiff Fawwaz Hamati, by and through his undersigned counsel, hereby moves the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an order preliminarily approving the proposed settlement of this action (the “Settlement”) as memorialized in the Stipulation of Settlement, dated March 8, 2016 (docket entry number 122), certifying the Class for settlement purposes, establishing hearing and deadline dates relating to the Settlement and its administration, and approving the form and methods of notifying Class Members of the Settlement and their rights with respect thereto. Defendants do not oppose the relief requested by this motion.

This motion is based upon the present Motion, the Stipulation of Settlement, the supporting Memorandum, the Declaration of Kara M. Wolke, and all pleadings, records and papers on file herein.

DATED: March 14, 2016

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**PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO EASTERN
DISTRICT OF TENNESSEE LOCAL RULES AND ECF RULES**

I, the undersigned, say:

I am a citizen of the United States and am over the age of 18 and not a party to the within action. My business address is 1925 Century Park East, Suite 2100, Los Angeles, California 90067.

On March 14, 2016, I served the following document:

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT, CONDITIONAL CERTIFICATION OF A CLASS, AND
ESTABLISHING NOTICE PROCEDURES**

By posting the document to the ECF Website of the United States District Court for the Eastern District of Tennessee, for receipt electronically by the parties as listed on the attached Court's ECF Service List.

And on any non-ECF registered parties:

By U.S. Mail: By placing true and correct copies thereof in individual sealed envelope: with postage thereon fully prepaid, which I deposited with my employer for collection and mailing by the United States Postal Service. I am readily familiar with my employer's practice for the collection and processing of correspondence or mailing with the United States Postal Service. In the ordinary course of business, this correspondence would be deposited by my employer with the United States Postal Service that same day.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 14, 2016, at Los Angeles, California.

s/ Kara M. Wolke
Kara M. Wolke

Mailing Information for a Case 3:14-cv-00338-PLR-HBG Farrah, et al v. Provectus Biopharmaceuticals, Inc., et al (PLR2)

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